

EXHIBIT 32  
FEDEX ANTI-  
HARASSMENT  
POLICY SECTION 5-5

## 5-55 Anti-Harassment

(Last Revised 15 Nov 2020)

### Policy

FedEx Express condemns any acts in its work environments that create the potential for illegal harassment, both in terms of individual employee morale and in violation of applicable federal, state, and local laws. FedEx Express will not tolerate harassment of any employee because of that employee's sex, pregnancy (including childbirth or a related medical condition), sexual orientation, gender identity, gender expression, marital status, gender, race, color, religion, national origin, citizenship, age, genetic information, military leave or service, covered veteran status, disability, participation in EEO protected activity, or any other status protected by federal, state, or local law, or association with a person on the basis of one or more of the foregoing.

### Scope

This policy applies to all FedEx Express personnel and affiliates, including employees covered by a collective bargaining agreement, and facilities and extends to those with whom the Company conducts business, internally or externally, including clients, customers, and vendors.

### Guidelines

#### Definition

Harassment is a form of employment discrimination that is impossible to define with precision. Whether or not inappropriate behavior constitutes illegal harassment depends upon many factors. Thus, the descriptions below are intended to provide a general outline of the types of behavior that are inappropriate in the workplace. FedEx Express policy prohibits all inappropriate language and conduct—regardless of whether that behavior would legally constitute “harassment.”

**Sexual harassment.** Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature may constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a working environment that is intimidating, hostile, or offensive to the individual.

Sexually inappropriate behavior can take many other forms including, but not limited to repeated propositions or requests for dates, leering or staring, innuendos, flirting, or unwanted physical contact.

**Other inappropriate harassment.** Examples of behavior which is not sexually provocative but is deemed inappropriate, and depending upon the circumstances, may constitute unlawful harassment, include the following:

- Gender-based comments or stereotyping, or other demeaning conduct directed at an employee because of his or her gender.
- Jokes, stereotyping insults, relating to religious beliefs, nationality, age, or disability.
- Intimidation, name calling, invasion of personal space or other forms of aggression based on membership in a protected class.
- Racial epithets or derogatory comments based on race, color or national origin.

**Note:** Anyone affected by offensive conduct can be a victim of harassment; the victim does not have to be the person harassed. Victims are encouraged, but not required, to inform the offender the conduct is unwelcome.

#### Prohibited Conduct

An offensive display, of any drawing, object, or symbol which adversely portrays a protected class and is determined by HR, in consultation with the Employment Law group, to interfere with a reasonable employee's ability to perform a job is prohibited.

All employees should avoid any inappropriate action or conduct that might be viewed as harassing behavior. Approval of, participation in, or acquiescence in such conduct will be considered a violation of this policy. Inappropriate behavior and harassment is not tolerated and may result in discipline up to and including discharge.

Conduct occurring offsite may violate this policy. FedEx Express expects its employees to conduct themselves in a manner consistent with policy at FedEx facilities and offsite at FedEx Express related events occurring outside of normal business hours. Conduct occurring online or otherwise not in-person may also violate FedEx Express policy.

**Note:** Employees in supervisory positions are prohibited from dating or having personal/intimate relationships with subordinates. Because teamleaders, ramp agents, dispatchers and other “lead” positions occasionally afford opportunities/responsibilities of a supervisory nature, employees in these positions are also prohibited from dating or having intimate relationships with the people they lead.

#### Complaints

If any employee believes that he or she has been subjected to harassment by anyone, including supervisors, coworkers, vendors, or customers, he or she must immediately report this to management or HR. Any employee who observes conduct that could be perceived as sexual or other harassment should immediately report that conduct to management or HR. Any member of management who receives a report or complaint of sexual or other harassment must immediately report the complaint to HR even if the complaining employee asks that no action be taken. Any manager who fails to take action upon receiving a complaint of harassment may be subject to discipline, up to and including discharge.

Complaints of sexual or other illegal harassment will be treated as internal EEO complaints and follow the internal EEO procedure as outlined in [5-6 Internal EEO Complaint Process, Table 1, Internal EEO Discrimination, Harassment, or Retaliation Complaint Process](#). All complaints will be promptly investigated in as confidential a manner as is possible while still conducting a thorough investigation.

#### Retaliation Prohibited

There will be no retaliation against any employee who reports a claim or incident of sexual or other harassment or against any employee who participates as a witness in a harassment investigation. Any employee who feels that he or she has been subjected to retaliation must immediately make a report to management or HR.

#### State of Oregon Unlawful Harassment Policy

The State of Oregon has established specific laws and guidance that address sexual assault, and unlawful harassment and discrimination. If you are a FedEx Express employee who performs job-related duties on the Company's behalf in the State of Oregon, refer to the following intranet hyperlink for further information: [http://library.fedex.com/library/corporate/people/pdf/oregon\\_workplace\\_fairness\\_act\\_policy.pdf](http://library.fedex.com/library/corporate/people/pdf/oregon_workplace_fairness_act_policy.pdf).

#### Outside Regulatory Agency Complaints

If a complaint is filed via an outside regulatory agency,  
**REFER TO:** [5-15 External EEO Complaint Investigation](#).

#### Related Policies

- [2-5 Acceptable Conduct](#)
- [4-50 Close Personal Relationships](#)
- [5-5 Guaranteed Fair Treatment Procedure](#)
- [5-15 External EEO Complaint Investigation](#)
- [10-5 Confidential Information Protection](#)